

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**In re** §  
§  
**FPMC San Antonio Realty Partners, LP** § **Case No. 15-52462-cag**  
§ **(Chapter 11)**  
**Debtor** §

**ENTRY OF APPEARANCE AND  
REQUEST FOR NOTIFICATION**

TO THE HONORABLE CLERK OF THE UNITED STATES BANKRUPTCY COURT:

Now comes LIBERTY CAPITAL BANK, creditor and interested party in the above-styled and numbered case ("Applicant"), by and through its attorneys, Branscomb PC, by Patrick H. Autry, and files this Entry of Appearance and Request for Notification pursuant to Bankruptcy Rules 9010 and 2002 and the Local Rules of this Court, and would show the Court as follows:

- 1) Applicant is a creditor and interested party in this case. Applicant has a right to receive notice of those matters filed in this case which affect Applicant, including, but not limited to, CONTESTED and NON-CONTESTED MATTERS and ADVERSARY PROCEEDINGS, pursuant to Bankruptcy Rule 2002 and the Local Rules of this Court.
- 2) Applicant requests that notice of those CONTESTED or NON-CONTESTED matters or ADVERSARY PROCEEDINGS affecting Applicant and set for hearing in this case be sent to the following:

Patrick H. Autry  
BRANSCOMB PC  
711 Navarro Street, Suite 500  
San Antonio, Texas 78205  
Email: [pautry@branscombpc.com](mailto:pautry@branscombpc.com)

PLEASE TAKE FURTHER NOTICE that in filing this Entry of Appearance and Request for Notification, Applicant does not consent to have any matter heard in the Bankruptcy Court; do not waive any right that they may have to contest jurisdiction in any proceeding involving their claims or interests; do not waive the right to seek dismissal of the case, do not waive the right under applicable non-bankruptcy law to trial by jury; and do not consent to have any such trial conducted in the Bankruptcy Court.

WHEREFORE, PREMISES CONSIDERED, Applicant respectfully requests that the name and address of its counsel as hereinabove stated be put on the mailing matrix to receive notices of any and all CONTESTED or NON-CONTESTED matters affecting Applicant filed in this case, including any ADVERSARY PROCEEDING affecting Applicant within the context of this case, pursuant to Bankruptcy Rule 2002 and the Local Rules of this Court.

Dated: October 22, 2015

Respectfully submitted,

BRANSCOMB PC  
711 Navarro Street, Suite 500  
San Antonio, Texas 78205  
Telephone 210-598-5400  
Telecopier 210-598-5405  
Email pautry@branscombpc.com

BY: /s/ Patrick H. Autry  
Patrick H. Autry  
State Bar No. 01447600

ATTORNEYS FOR LIBERTY CAPITAL BANK

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing Entry of Appearance and Request for Notification was served by first-class mail, postage prepaid, this 22 day of October, 2015 to:

**Counsel for Debtor:**

Raymond W. Battaglia  
Law Offices of Ray Battaglia, PLLC  
66 Granburg Circle  
San Antonio, TX 78218

/s/ Patrick H. Autry  
Patrick H. Autry